

United States District Court

for the
Western District of New York



United States of America

v.

Case No. 25-mj- **5080**

Andre Raymond

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of March 28, 2025, in the Western District of New York, the defendant, **Andre RAYMOND**, an alien, and not a citizen or national of the United States, did knowingly and willfully enter the United States at a time and place other than as designated by Immigration Officers for entry into the United States.

All in violation of Title 8, United States Code, Section 1325(a)(1).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

Thomas J. Coffman
Complainant's signature

THOMAS J. COFFMAN
BORDER PATROL AGENT
UNITED STATES BORDER PATROL

Printed name and title

Sworn to before me and signed

telephonically. Date: April 7, 2025

Michael J. Roemer
Judge's signature

City and State: Buffalo, New York

HON. MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, Thomas J. Coffman, being duly sworn, deposes and says that:

1. I am a United States Border Patrol Agent with the United States Border Patrol, within the Department of Homeland Security, stationed in Buffalo, New York. I have been so employed as a Border Patrol Agent for fourteen years. In such capacity, my official duties include investigating persons who have violated federal immigration laws and other related federal statutes.

2. As part of my current duties, I have become involved in an investigation of a suspected violation of Title 8, United States Code, Section 1325(a)(1).

3. I make this Affidavit in support of the Criminal Complaint charging Andre RAYMOND, born in 1981, with a violation of Title 8, United States Code, Section 1325(a)(1), being an alien, and not a citizen or national of the United States, found in the United States. The affidavit is based upon my own knowledge, my review of official records of the former Immigration and Naturalization Service ("INS") and current Immigration & Customs Enforcement ("ICE"), and upon information that I obtained from other law enforcement officers involved with this investigation. Because it is submitted for the limited

purpose of obtaining a Criminal Complaint, I have not included every fact known to me concerning this investigation. I have set forth only facts that I believe are necessary to establish probable cause to demonstrate that Title 8, United States Code, Section 1325(a) has been violated by Andre RAYMOND.

4. On or about March 28, 2025, at approximately 8:13 P.M., Buffalo Sector's Integrated Border Communications Center (IBCC) relayed to Agents in the field that they had visual of a subject crossing the International Train Bridge towards the United States from Canada. The International Train Bridge is used for rail freight only and pedestrians are strictly prohibited from crossing. The International Train Bridge carries a high volume of international rail freight and is extremely dangerous, particularly in the event of low light or night.

5. Agent Hill, who was assigned to this area, exited his U.S. Border Patrol service vehicle and walked towards the International Train Bridge to gain visual of the individual who he later learned was subject Andre RAYMOND. The IBCC then relayed via service radio that it appeared RAYMOND was wearing a backpack, and he was still walking on the bridge towards the United States.

6. At this time, Agent Hill gained visual of RAYMOND walking towards him wearing dark clothing and a backpack. Agent Hill identified himself as a United States Border Patrol Agent and ordered RAYMOND to stop and return back to Canada, in both the English and Spanish languages. RAYMOND did not comply and replied to Agent Hill in the English language, "I'm not going back" as he continued walking toward Agent Hill. RAYMOND, at

this point, had entered and was located in the United States.

7. The IBCC notified Agent Hill that there was an outbound train heading in his direction. Agent Hill informed the train's conductor that there was a subject on the railroad bridge. The train then came to a complete stop right before entering the bridge. At this time, RAYMOND was off the bridge and on United States soil. Agent Hill approached RAYMOND and verbally identified himself as a United States Border Patrol Agent in both the English and Spanish languages. Agent Hill then determined through questioning that RAYMOND is a citizen and national of St. Lucia and a Permanent Resident of Canada present in the United States without the proper documents to enter in, remain, or pass through. RAYMOND was then transported to the Buffalo Border Patrol Station for further processing.

8. Upon arrival at the Buffalo Border Patrol Station, a complete set of fingerprints were electronically captured from RAYMOND and submitted to the Federal Bureau of Investigation ("FBI"), Identification Division, in Clarksburg, West Virginia, via the Integrated Automated Fingerprint Identification System ("IAFIS"). This set of fingerprints produced no positive match to RAYMOND requesting permission to enter the United States.

9. Records checks failed to disclose any record that the defendant had applied for or received the requisite permission to enter the United States from the Attorney General or the Secretary of Homeland Security.

10. Based on the foregoing, your affiant respectfully submits that there is probable

cause to believe that the defendant, Andre RAYMOND, did enter the United States at a time and place not designated as a port of entry on March 28, 2025, all in violation of United States Code, Section 1325(a)(1).

Thomas J. Coffman

THOMAS J. COFFMAN
Border Patrol Agent
United States Border Patrol

Sworn and subscribed to before me
telephonically on this 7th day of April, 2025.

Michael J. Roemer

HONORABLE MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE